

# Exhibit 2

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

FAIRFIELD SENTRY LIMITED, et al.,

Debtors in Foreign Proceedings.

Chapter 15 Case

Case No. 10-13164 (CGM)

Jointly Administered

FAIRFIELD SENTRY LIMITED (IN LIQUIDATION), et al.,

Plaintiffs,

– against –

THEODOOR GGC AMSTERDAM, et al.,

Defendants.

Adv. Pro. No. 10-3496  
(CGM)

Administratively  
Consolidated

FAIRFIELD SENTRY LIMITED (IN LIQUIDATION), et al.,

Plaintiffs,

– against –

ABN AMRO SCHWEIZ AG a/k/a ABN AMRO  
(SWITZERLAND) AG, et al.,

Defendants.

Adv. Pro. No. 10-3635  
Adv. Pro. No. 10-3636  
(CGM)

**STIPULATION**

Consolidated Plaintiffs,<sup>1</sup> Liechtensteinische Landesbank AG (sued as Liechtensteinische LB Reinvest AMS) (“LLB”), and LGT Bank in Liechtenstein AG (“LGT”) (together, “the parties”), by and through undersigned counsel, state as follows:

**WHEREAS**, at a conference held on April 21, 2021, the Court ruled that any Defendant wishing to move to dismiss under Rule 12(b)(5) of the Federal Rules of Civil Procedure must preserve the right to make the motion on the record at the same conference and must move by May 21, 2021;

**WHEREAS**, at the April 21, 2021 conference, the Court permitted limited discovery on service issues as to any entity that moved to dismiss under Rule 12(b)(5), citing *Ganpat v. E. Pac. Shipping, PTE, Ltd.*, No. CV 18-13556, 2020 WL 1046336, at \*1 (E.D. La. Mar. 4, 2020);

**WHEREAS**, on May 21, 2021, LLB and LGT moved to dismiss the complaints in adversary proceedings 10-3635 and 10-3636 as to LLB and LGT under Rule 12(b)(5) of the Federal Rules of Civil Procedure and Rule 7012(b) of the Federal Rules of Bankruptcy Procedure (Dkt. 3772, 3775<sup>2</sup>);

**WHEREAS**, on May 27, 2021, Consolidated Plaintiffs served Requests for Production and Notices of Rule 30(b)(6) Depositions on LLB and LGT;

**IT IS HEREBY STIPULATED AND AGREED THAT:**

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<sup>1</sup> “Consolidated Plaintiffs” are Kenneth Krys and Greig Mitchell (or their predecessors) as Liquidators and Foreign Representatives of all three funds—Fairfield Sentry Limited (In Liquidation), Fairfield Sigma Limited (In Liquidation), and Fairfield Lambda Limited (In Liquidation).

<sup>2</sup> All references to docket numbers are to the consolidated omnibus docket in adversary proceeding 10-03496.

1. On or about September 14, 2010, LLB retained Reiss & Preuss LLP to provide advice and representation regarding the lawsuits by Fairfield Sentry Ltd., Fairfield Sigma Ltd., and Fairfield Lambda Ltd. against LLB in New York State Supreme Court, Index No. 650277/2010 and Index No. 650316/2010 (the “State Court Actions”). Reiss & Preuss LLP never appeared in either of the State Court Actions. Reiss & Preuss LLP continued to render legal services as described in paragraph 5 to LLB upon Plaintiffs’ removal of the State Court Actions to federal court in the above-captioned adversary proceedings. The representation of LLB by Reiss & Preuss LLP ended on December 28, 2018, upon Jascha D. Preuss leaving that firm.

2. On or about January 2, 2019, LLB retained Wuersch & Gering LLP, Jascha D. Preuss’ new firm, to provide legal services in connection with the above-captioned adversary proceedings. Wuersch & Gering LLP has rendered the legal services described in paragraph 5 to LLB from January 2, 2019 through the date of this Stipulation.

3. On or about November 12, 2010, LGT retained Milbank, Tweed, Hadley & McCloy LLP (“Milbank”) to render legal services in connection with various lawsuits filed by Fairfield Sentry Ltd. and related entities, including the above-captioned adversary proceedings.

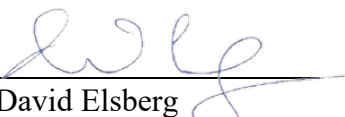
4. On or about May 6, 2020, LGT retained Wuersch & Gering LLP to represent it in the above-captioned adversary proceedings, and the transfer of the representation from Milbank to Wuersch & Gering LLP was completed by so-ordered stipulation on or about July 10, 2020. Wuersch & Gering LLP has rendered the legal services described in paragraph 5 to LGT from the transfer of representation through the date of this Stipulation.

5. The above-identified counsel’s representation consisted of reviewing the complaints in the adversary proceedings, advising LLB and LGT concerning possible defenses and litigation options, monitoring and reporting to LLB and LGT on docket activity and

developments in the proceedings, and representing LLB and LGT in motion practice and court conferences, as needed to preserve or assert LLB and LGT's defenses, including the defense of improper service.

*[Remainder of Page Intentionally Left Blank]*

Dated: New York, New York  
July 15, 2021

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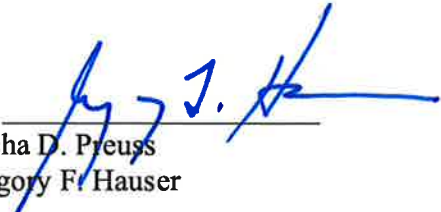
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